

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Nicholas J. Cremona
Dean D. Hunt
Farrell A. Hochmuth

Hearing Date: December 21, 2016

Response Due: December 14, 2016

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and for the Estate of Bernard L.
Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JAMES B. PINTO REVOCABLE TRUST U/A DTD
12/1/03; and JAMES B. PINTO, individually and in
his capacity as Grantor and Trustee for the James B.

Adv. Pro. No. 10-04538 (SMB)

Pinto Revocable Trust,

Defendants.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

AMY PINTO LOME REVOCABLE TRUST U/A/D
5/22/03; AMY PINTO LOME, individually and in
her capacity as Grantor and Trustee for the Amy
Pinto Lome Revocable Trust u/a/d 5/22/03; and
LEONARD D. LOME, in his capacity as Trustee for
the Amy Pinto Lome Revocable Trust u/a/d 5/22/03,

Defendants.

Adv. Pro. No. 10-04588 (SMB)

NOTICE OF CONSOLIDATED MOTION FOR SANCTIONS

PLEASE TAKE NOTICE that upon the accompanying Motion, Irving H. Picard, as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities, LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and Bernard L. Madoff, by and through his counsel, Baker & Hostetler LLP, will move the Court for entry of the proposed Order, submitted herewith, requesting sanctions against the following Defendants in two adversary proceedings:

- (1) James B. Pinto Revocable Trust u/a dtd 12/1/03; and James B. Pinto, individually and in his capacity as Grantor and Trustee for the James B. Pinto Revocable Trust;¹ and
- (2) Amy Pinto Lome Revocable Trust u/a/d 5/22/03; Amy Pinto Lome, individually and in her capacity as Grantor and Trustee for the Amy Pinto Lome Revocable Trust u/a/d 5/22/03; and Leonard D. Lome, in his capacity as Trustee for the Amy Pinto Lome Revocable Trust u/a/d 5/22/03;²

¹ Adversary Proceeding Number 10-04538 (SMB).

² Adversary Proceeding Number 10-04588 (SMB).

on December 21, 2016, at 10:00a.m., or as soon thereafter as counsel may be heard, before the Honorable Stuart M. Bernstein at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York, 10004.

PLEASE TAKE FURTHER NOTICE that any response or objection to the Motion must be: (i) in writing, conform to the applicable rules of this Court and be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York, 10004, in accordance with Local Rule 9006-1 of the United States Bankruptcy Court, Southern District of New York by no later than 5:00p.m. on December 14, 2016 (the “Objection Deadline”) (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein); and (ii) served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York, 10111, Attn: David J. Sheehan and Nicholas J. Cremona; and (b) Securities Investor Protection Corporation, 805 15th Street N.W., Suite 800, Washington, D.C. 20005, Attn: Kevin H. Bell, so as to be received no later than the Objection Deadline. Any objection must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

PLEASE TAKE FURTHER NOTICE that if no responses or objections are timely filed and served with respect to the Motion, the motion shall be deemed uncontested and an order granting the requested relief may be entered with no further notice or opportunity to be heard offered to any party.

Respectfully submitted,

Dated: New York, New York
December 6, 2016

Of Counsel:

BAKER & HOSTETLER LLP
811 Main Street, Suite 1100
Houston, Texas 77002-5018
Telephone: 713.751.1600
Facsimile: 713.751.1717
Dean D. Hunt
Email: dhunt@bakerlaw.com
Farrell A. Hochmuth
Email: fhochmuth@bakerlaw.com

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

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